

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

INSTRUCTIONS:**DO NOT WRITE IN THIS SPACE**

Case

Date Filed

32-CA-201160

6 22 2017

File an original of this charge with NLRB Regional Director in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Google, Inc., a subsidiary of Alphabet Inc.		b. Tel. No. (650) 253-3640
		c. Cell No. (415) 867-5506
d. Address (street, city, state ZIP code) 1600 Amphitheater Pkwy Mountain View, CA 94043-1351	e. Employer Representative Jenn Blackstone, Senior Counsel	f. Fax No.
		g. e-Mail jblackstone@google.com
		h. Dispute Location (City and State) Mountain View, CA
i. Type of Establishment (factory, nursing home, hotel) Technology	j. Principal Product or Service Internet search engine	k. Number of workers at dispute location 30,000

1. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

Within the past six months, and continuing to the present date, the above-named Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by promulgating, maintaining, and enforcing the following work rules or policies: Alphabet Code of Conduct policy; the Employee Communications policy; the Workplace Concern policy; the Chromium Code of Conduct policy; the Conflict of Interest policy; the Policy Against Harassment, Discrimination, and Retaliation; the Personal Political Activity for U.S. Googlers policy; the Guide to Personal Political Activity policy; the You Said What? Policy; the Retaliation policy; the Standards of Conduct policy; the 'No Jerks' policy; and the Executive Order HRBP FAQ policy dated on or about March 6, 2017.

Within the past six months, and continuing to the present date, the above-named Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by interrogating employees about their protected concerted activities, by engaging in surveillance of employees' protected concerted activities, and by threatening employees with threats of unspecified reprisals because of their protected concerted activities.

3. Full name of party filing charge (if labor organization, give full name, including local name and number)

(b) (6) (b) (7) (C)

4a. Address (street and number, city, state, and ZIP code)

(b) (6) (b) (7) (C)

4b. Tel. No.

(b) (6) (b) (7) (C)

4c. Cell No.**4d. Fax No.****4e. e-Mail**

(b) (6) (b) (7) (C)

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)**6. DECLARATION**

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.

(b) (6), (b) (7) (C)

By:

(signature of representative or person making charge)

(b) (6) (b) (7) (C), an individual

Print Name and Title

Date: 6/22/2017

Tel. No.

(b) (6) (b) (7) (C)

Office, if any, Cell No.**Fax No.****e-Mail**

(b) (6) (b) (7) (C)

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

REGION 32
1301 Clay St Ste 300N
Oakland, CA 94612-5224

Agency Website: www.nlr.gov
Telephone: (510)637-3300
Fax: (510)637-3315



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June 23, 2017

JENN BLACKSTONE, SENIOR COUNSEL
GOOGLE, INC., A SUBSIDIARY OF ALPHABET INC.
1600 AMPHITHEATRE PKWY
MOUNTAIN VIEW, CA 94043-1351

Re: **GOOGLE, INC.,
A SUBSIDIARY OF ALPHABET INC.
Case 32-CA-201160**

Dear Ms. Blackstone:

Enclosed is a copy of a charge that has been filed in this case. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

Investigator: This charge is being investigated by Field Examiner Alexander M. Hajduk whose telephone number is (510)671-3024. If this Board agent is not available, you may contact Supervisory Attorney Catherine Ventola whose telephone number is (510)671-3049.

Right to Representation: You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing Form NLRB-4701, Notice of Appearance. This form is available on our website, www.nlr.gov, or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

Presentation of Your Evidence: We seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations set forth in the charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

Full and complete cooperation includes providing witnesses to give sworn affidavits to a Board agent, and providing all relevant documentary evidence requested by the Board agent. Sending us your written account of the facts and a statement of your position is not enough to be considered full and complete cooperation. A refusal to fully cooperate during the investigation might cause a case to be litigated unnecessarily.

In addition, either you or your representative must complete the enclosed Commerce Questionnaire to enable us to determine whether the NLRB has jurisdiction over this dispute. If you recently submitted this information in another case, or if you need assistance completing the form, please contact the Board agent.


We will not honor any request to place limitations on our use of position statements or evidence beyond those prescribed by the Freedom of Information Act and the Federal Records Act. Thus, we will not honor any claim of confidentiality except as provided by Exemption 4 of FOIA, 5 U.S.C. Sec. 552(b)(4), and any material you submit may be introduced as evidence at any hearing before an administrative law judge. We are also required by the Federal Records Act to keep copies of documents gathered in our investigation for some years after a case closes. Further, the Freedom of Information Act may require that we disclose such records in closed cases upon request, unless there is an applicable exemption. Examples of those exemptions are those that protect confidential financial information or personal privacy interests.

Procedures: We strongly urge everyone to submit all documents and other materials by E-Filing (not e-mailing) through our website, www.nlr.gov. However, the Agency will continue to accept timely filed paper documents. Please include the case name and number indicated above on all your correspondence regarding the charge.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, www.nlr.gov or from an NLRB office upon your request. NLRB Form 4541 offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,



Valerie Hardy-Mahoney
Regional Director

Enclosures:

1. Copy of Charge
2. Commerce Questionnaire



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Download
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June 23, 2017

(b) (6), (b) (7)(C)

Re: **GOOGLE, INC.,
A SUBSIDIARY OF ALPHABET INC.
Case 32-CA-201160**

Dear (b) (6), (b) (7)(C):

The charge that you filed in this case on June 22, 2017 has been docketed as case number 32-CA-201160. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

Investigator: This charge is being investigated by Field Examiner Alexander M. Hajduk whose telephone number is (510)671-3024. If this Board agent is not available, you may contact Supervisory Attorney Catherine Ventola whose telephone number is (510)671-3049.

Right to Representation: You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, www.nlrb.gov, or at the Regional office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

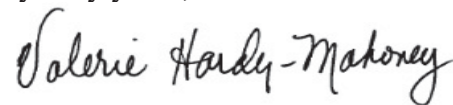
Presentation of Your Evidence: As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. Because we seek to resolve labor disputes promptly, you should be ready to promptly present your affidavit(s) and other evidence. If you have not yet scheduled a date and time for the Board agent to take your affidavit, please contact the Board agent to schedule the affidavit(s). If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed without investigation.

Procedures: We strongly urge everyone to submit all documents and other materials by E-Filing (not e-mailing) through our website www.nlr.gov. However, the Agency will continue to accept timely filed paper documents. Please include the case name and number indicated above on all your correspondence regarding the charge.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website www.nlr.gov or from the Regional Office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

A handwritten signature in black ink that reads "Valerie Hardy-Mahoney". The signature is written in a cursive, flowing style.

Valerie Hardy-Mahoney
Regional Director



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REGION 32
1301 Clay St Ste 300N
Oakland, CA 94612-5224

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September 29, 2017

J. AL LATHAM JR., ATTORNEY AT LAW
CAMERON W. FOX, ATTORNEY AT LAW
ANKUSH DHUPAR, ESQ.
PAUL HASTINGS LLP
515 SOUTH FLOWER STREET, 25TH FLOOR
LOS ANGELES, CA 90071-2228

Re: Google, Inc., a subsidiary of Alphabet, Inc.
Case 32-CA-201160

Dear Mr. LATHAM, Ms. FOX, and Mr. DHUPAR:

This is to advise that I have approved the withdrawal of the portions of the charge alleging that the Employer violated Section 8(a)(1) of the Act by: interrogating employees about their protected concerted activities; engaging in surveillance of employees' protected concerted activities; and by promulgating, maintaining, and enforcing the Workplace Concern Policy, the Conflicts of Interest Policy; the Policy Against Harassment, Discrimination, and Retaliation; the Guide to Personal Political Activity Policy; the You Said What? Policy; the Retaliation Policy; the Standards of Conduct Policy; and the Executive Order HRBP FAQ Policy.

The remaining allegations that the Employer violated Section 8(a)(1) of the Act by threatening employees with threats of unspecified reprisals because of their protected concerted activities and by promulgating and/or maintaining unlawful rules in the Alphabet Code of Conduct, the Employee Communications Policy, the Chromium Code of Conduct Policy, the Personal Political Activity for U.S. Googlers Policy, and the "No Jerks" Policy, remain subject to further processing.


Very truly yours,

/s/ Catherine Ventola

Catherine Ventola
Acting Regional Director

cc: JENN BLACKSTONE, SENIOR
COUNSEL
GOOGLE, INC., A SUBSIDIARY OF
ALPHABET, INC.
1600 AMPHITHEATRE PKWY
MOUNTAIN VIEW, CA 94043-1351

(b) (6), (b) (7)(C)

A large black rectangular redaction box covers the bottom right portion of the document, obscuring several lines of text.



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REGION 32
1301 Clay St Ste 300N
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August 31, 2018

J. AL LATHAM JR., ATTORNEY AT LAW
PAUL HASTINGS, LLP
515 SOUTH FLOWER STREET, 25TH FLOOR
LOS ANGELES, CA 90071-2201

CAMERON W. FOX, ATTORNEY AT LAW
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PAUL HASTINGS LLP
515 SOUTH FLOWER STREET, 25TH FLOOR
LOS ANGELES, CA 90071-2228

Re: Google, Inc., a subsidiary of Alphabet, Inc.
Case 32-CA-201160

Dear Mr. Latham, Mr. Fox and Mr. Dhupar:

This is to advise you that I have approved the withdrawal of the remaining 8(a)(1) allegations in the charge in the above matter.

Very truly yours,

Valerie Hardy-Mahoney
Regional Director

cc: JENN BLACKSTONE,
SENIOR COUNSEL
GOOGLE, INC., A SUBSIDIARY OF
ALPHABET, INC.
1600 AMPHITHEATRE PKWY
MOUNTAIN VIEW, CA 94043-1351

(b) (6), (b) (7)(C)